

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,¹

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3284-LTS

**STIPULATION AND PROPOSED ORDER TO FURTHER EXTEND DEADLINES SET
FORTH IN THE COURT'S ORDER ENTERED ON FEBRUARY 14, 2019 (ECF NO. 596)**

¹ The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), as fiscal agent and financial advisor of the Commonwealth of Puerto Rico (the “Commonwealth”), and the Official Committee of Unsecured Creditors (the “UCC,” and together with AAFAF and the Commonwealth, the “Parties”) respectfully submit the following *Stipulation and Proposed Order to Further Extend Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* (the “Stipulation”) requesting entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), to amend the deadlines in connection with the *Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 582] (the “Motion”).

WHEREAS, on February 14, 2019, the Court entered the *Order Setting Deadline for Joint Status Report in Connection with Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 596], setting a deadline for AAFAF and the UCC to file a joint status report in connection with the Motion and for AAFAF to file a further separate brief by the same deadline regarding its positions on the contracting issues raised by the UCC if those issues have not been resolved consensually.

WHEREAS, on February 20, 2019, the Court entered the *Order Revising Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* [ECF No. 607], extending the deadlines in connection with the Motion.

WHEREAS, on April 3, 2019, the Court entered the *Order Further Extending Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* [ECF No. 628] (the “Revised Scheduling Order”), further extending the deadlines in connection with the Motion.

WHEREAS, under the Revised Scheduling Order, the joint status report is due May 24, 2019, and the matter will be heard at the June 12, 2019 omnibus hearing.

NOW THEREFORE, the Parties have agreed to the following extension of deadlines set forth in the Revised Scheduling Order in order to permit the Parties to continue to meet and confer

in an attempt to consensually resolve outstanding issues regarding the Motion:

1. July 3, 2019: AAFAF and the UCC to file a joint status report. Unless the UCC's objections have been resolved, AAFAF will file a separate brief regarding its positions on the contracting issues raised by the UCC;

2. July 24, 2019: Motion to be heard at the July Omnibus Hearing.

3. For the avoidance of doubt, nothing herein shall affect the rights of any party, person, or entity with respect to discovery, or to oppose discovery, in connection with the Motion, or to seek further adjournment of the Motion, or to oppose such adjournment, all of which rights are fully preserved.

[Remainder of page intentionally left blank]

Dated: San Juan, Puerto Rico
May 21, 2019

/s/ Peter Friedman

John J. Rapisardi (*pro hac vice*)
Suzanne Uhland (*pro hac vice*)
Peter Friedman (*pro hac vice*)
O'MELVENY & MYERS LLP
Times Square Tower
Seven Times Square
New York, NY 10036
Tel.: (212) 326-2000
Fax: (212) 326-2061

*Attorneys for the Puerto Rico Fiscal Agency
and Financial Advisor Authority*

/s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi
USDC No. 222301
Carolina Velaz-Rivero
USDC No. 300913
MARINI PIETRANTONI MUÑOZ LLC
MCS Plaza, Suite 500
255 Ponce de León Ave.
San Juan, Puerto Rico 00917
Tel.: (787) 705-2171
Fax: (787) 936-7494

*Co-Attorneys for the Puerto Rico Fiscal
Agency
and Financial Advisor Authority*

Dated: San Juan, Puerto Rico
May 21, 2019

/s/ Luc. A. Despins

PAUL HASTINGS LLP

Luc. A. Despins, Esq. (Pro Hac Vice)
James R. Bliss, Esq. (Pro Hac Vice)
G. Alexander Bongartz, Esq. (Pro Hac Vice)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespins@paulhastings.com
jamesbliss@paulhastings.com
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured
Creditors for all Title III Debtors (other than
COFINA)*

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC

Juan J. Casillas Ayala, Esq., USDC - PR 218312
Diana M. Batlle-Barasorda, Esq., USDC - PR 213103
Alberto J. E. Añeses Negrón, Esq., USDC - PR 302
Ericka C. Montull-Novoa, Esq., USDC - PR 230601
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Telephone: (787) 523-3434
jcasillas@cstlawpr.com
dbatlle@cstlawpr.com
aaneses@cstlawpr.com
emontull@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured
Creditors for all Title III Debtors (other than
COFINA)*